



Refining

## Marathon Petroleum Company LP

539 South Main Street  
Findlay, OH 45840  
Telephone 419/422-2121

TRACKING NUMBER - 774409348160

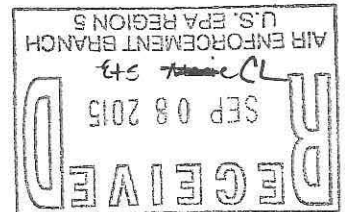
September 1, 2015

Chief Environmental Enforcement Section  
Environment and Natural Resources Division  
U.S. Department of Justice  
ENRD Mailroom, Room 2121  
601 D. Street, NW  
Washington, DC 20530

Director, Air Enforcement Division  
U.S. Environmental Protection Agency  
C/O Matrix New World Engineering, Inc.  
26 Columbia Turnpike  
Florham Park, NJ 07932

RE: Sulfur Recovery Unit PMO Plans – Annual Update 2015

Dear Sir or Madam:



Pursuant to Paragraph 21 (C) of the First Revised Consent Decree, as revised by the First Modification to the November 2005 First Revised Consent Decree, where applicable, United States of America et. al. v. Marathon Ashland Petroleum LLC (presently known as Marathon Petroleum Company LLC "MPC") (Civil Action No. 4:01CV-40119-PVG), MPC is submitting the attached annual updates of the SRU PMO Plans. These Plans describe activities for enhanced maintenance and operation of each Refinery's Sulfur Recovery Plant, the TGU(s), any supplemental control devices, and the appropriate upstream process units. These PMO Plans are a compilation of MPC's approaches for exercising good air pollution control practices for minimizing SO<sub>2</sub> emissions at each refinery.

Marathon completed the sale of the St Paul Park, MN Refinery to ACON Investments, L.L.C., NTR Partners LLC and TPG Capital L.P. on December 1, 2010. MPC's successor in interest is St. Paul Park Refining Co. LLC (SPPRC). Therefore, SPPRC will submit their SRU PMO Plan separately.

Four of MPC's Refinery SRU PMO Plans annual updates have been completed and are attached (as shown below) and are being submitted together. The SRU PMO Plans for the Catlettsburg, KY and Garyville, LA refineries will be completed and submitted individually prior to the CD deadline under separate cover.

- Attachment 1 – Canton, OH Refinery
- Attachment 2 – Detroit, MI Refinery - *Lucia*
- Attachment 3 – Robinson, IL Refinery
- Attachment 4 – Texas City, TX Refinery

MPC understands that these Plans will be reviewed by personnel from the U.S. Environmental Protection Agency and comments may be returned to MPC. If requested, MPC would be glad to meet with the USEPA personnel to discuss these Plans.

Should you have any questions or require additional information please contact this office.

Sincerely,

A handwritten signature in cursive script that reads "John H. Gray". The signature is written in dark ink and is positioned above the printed name.

John H. Gray  
Consent Decree Coordinator

JHG: vh  
Attachments (4)

Cc: Air and Radiation Division (1)

U.S. EPA, Region 5  
77 West Jackson Blvd. (AE-17J)  
Chicago, IL 60604  
Attn: Ms. Molly Desalle (Compliance Tracker)

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U.S. EPA, Region 5  
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Chicago, IL 60604

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Ohio EPA Division of Air Pollution Control  
Lazarus Government Center  
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Columbus, OH 43216-1049

Ms. Marisa Toppi (2)  
Canton Air Pollution Control  
Canton Health Department  
420 Market Avenue North  
Canton, OH 44702-1544

Michigan Department of Environmental Quality  
Air Quality Division (3)  
Cadillac Place, Suite 2-300  
3058 W. Grand Blvd.  
Detroit, MI 48202  
Attn: Ms. Wilhemina McLemore

Compliance and Enforcement Section  
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Illinois Environmental Protection Agency  
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Director  
Compliance Assurance and Enforcement Division  
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Mr. Glenn Shankle (MC 109) (5)  
Executive Director, TCEQ  
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Ms. Kay Bedenis (MPC) (3)  
Ms. Susan Hawkins (MPC) (4)  
Ms. Breanna Stevens (MPC) (5)  
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Note (1) - Canton, Detroit, & Robinson  
Attachments

Note (2) - Canton Attachment

Note (3) - Detroit Attachment

Note (4) - Robinson Attachment

Note (5) - Texas City Attachment

Note (6) - Electronic Copies - All Attachments

## Attachment 2

Detroit, MI Refinery

Marathon Petroleum Company LP			
Sulfur Recovery Facilities General Maintenance and Operating Guidelines	Document No.: <b>REW-AG-051-DT</b>	Approval Date: 08/27/2015	Page 1 of 39
	Revision No.: 14	Next Revision Date: 09/08/2016	
	Document Custodian: Environmental, Safety and Security		

# Sulfur Recovery Facilities

## General Maintenance & Operating Guidelines



**Marathon Petroleum Company LP**  
**Detroit Refinery**

Sulfur Recovery Facilities - General Maintenance & Operating Guidelines	Doc. No.: REW-AG-051-DT	Rev. No.: 13	Page 3 of 39
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**SECTION 7: Preventative Maintenance Work** – Routine preventative maintenance is performed on various pieces of equipment in the Sulfur Recovery Facilities to ensure the safe and efficient operation of the process units. Instrumentation for Emergency Shutdown (ESD) systems is tested for proper operation by MPC maintenance personnel on a semi-annual basis.

The testing is conducted in accordance with written procedures as outlined in the Emergency System Shutdown Testing Procedure. Preventative maintenance procedures are performed on all critical equipment on a weekly, monthly, quarterly, or semi-annual basis depending on the critical nature of the equipment.

**SECTION 8: Formal Equipment Inspections** - External visual inspections are conducted on pressure vessels, piping, and storage tanks to note visual indications of recent or potential failures, and to make recommendations for corrective action.

**SECTION 9: Turnaround Inspection and Repair** - Planned major maintenance shutdowns (turnarounds) of the Sulfur Recovery Units typically occur every three to six years.

**SECTION 10: Sulfur Plant Improvements** – Several improvements to the Sulfur Recovery Unit have been made to improve operation. Additional items are in various stages of development or implementation to improve overall SRU reliability.

**SECTION 11: Employee Training** – Area personnel are trained in every aspect of the sulfur recovery units during initial unit training and every three years afterwards. Training is accomplished with the use of written and field demonstration exams.

**SECTION 12: Sulfur Shedding Procedure** – The sulfur shedding procedure ensures safety, environmental compliance, and reliability of the Detroit Refinery by minimizing the impacts of unplanned or abnormal events resulting in the release of sulfur compounds.

**SECTION 13: Incident Reporting and Investigation** – Investigations are initiated to enhance the safety, environmental compliance, and reliability of the Detroit Refinery by establishing a means to capture unplanned or abnormal events.

**SECTION 14: Emissions Notification** – The notification section details environmental reporting compliance procedures. It allows an efficient means of notifying the appropriate agencies for spills or releases at the Detroit Refinery. In addition, this section provides information on reporting of periods in which sulfur pit vapors are not being educted back to the process.

**SECTION 15: Plan Responsibilities** – The Detroit PMO plan will be reviewed and updated on an annual basis as described in this section.

**SECTION 16: References**

**SECTION 17: Appendices**

## INTRODUCTION

Marathon Petroleum Company's (MPC's) Detroit Refinery (Refinery) is located near I-75 and Schaefer Highway in southwest Detroit. With the commissioning of the DHOUP project, the Refinery processes a nominal 130,000 Barrels per Day (B/D) of crude oil which is refined into a product mix of approximately 50% gasoline, 35% fuel oil, 10% asphalt, and 5% other products. The makeup of this production will vary depending on the type of crude used as charge stocks.

The Refinery occupies approximately 200 acres and is Michigan's only petroleum refining complex. Operationally, the Refinery is a fully integrated process. A steady stream exists from the moment raw materials enter the plant until finished products leave via truck, lake tanker, railroad car, or pipeline. This requires a seven day per week, 365 days per year operation.

The Refinery is organized into six complexes for operations and maintenance purposes.

Complex 1 consists of the Crude and Vacuum Units, and the WWTP.

Complex 2 consists of the Gas Oil and Distillate Hydrotreaters, Alkylation, and East Plant Sulfur Recovery Units (SRU A, B and C).

Complex 3 includes the Fluid Catalytic Cracking Unit (FCCU), Gas Concentration, Propylene and Saturates Gas Plant

Complex 4 includes the Platformer, Naphtha and Kerosene Hydrotreaters, and Boilers

Complex 5 contains the storage and blending facilities, as well as the Marine Loading Facilities at the Rouge Asphalt Terminal.

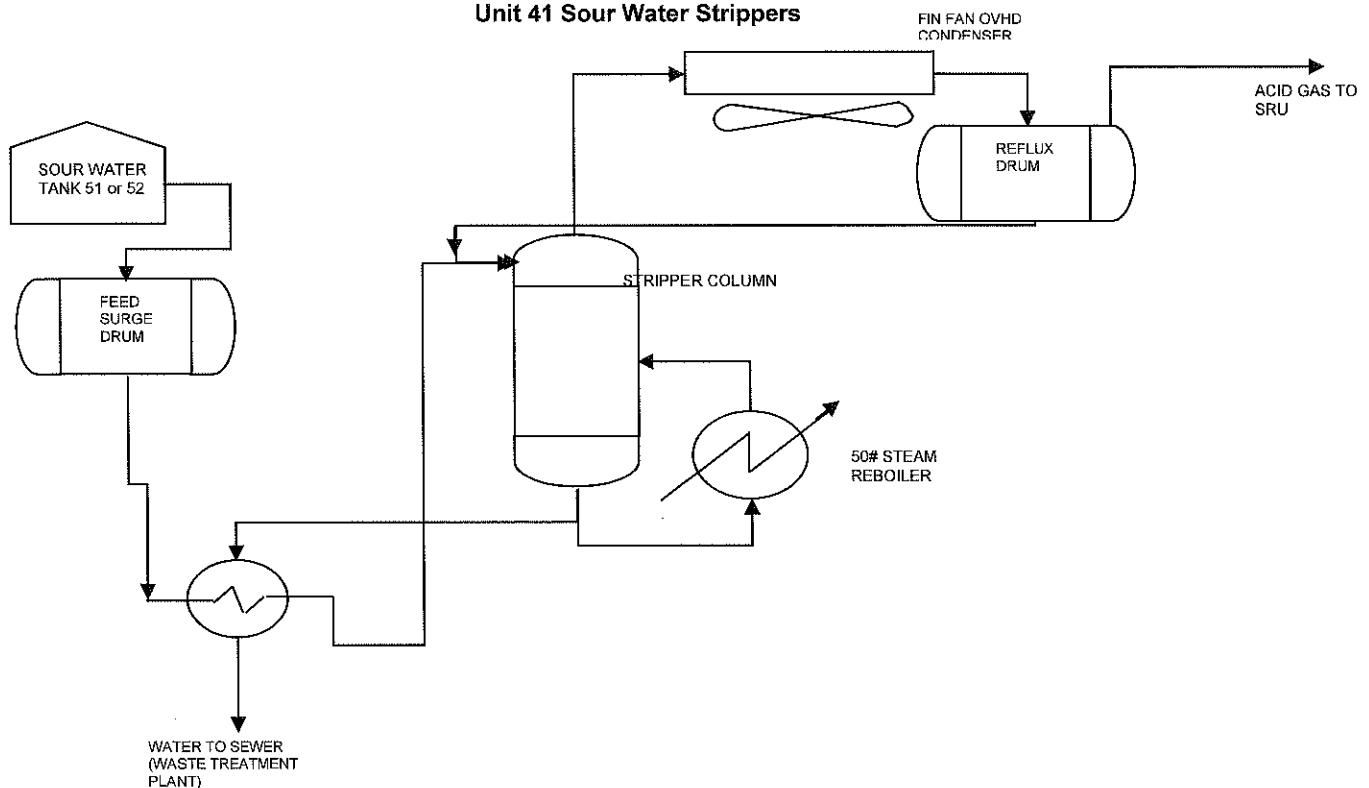
Complex 6 contains the Coker Unit and North Plant Sulfur Recovery Units (SRU A and B).

The East Plant consists of Complexes 1 and 2. The West Plant consists of Complexes 3 and 4. The North Plant consists of Complex 6. Complex 5 has operations in the East and West Plant, along with the Melvindale Tank Farm and the Rouge Asphalt Terminal. The Refinery operations are centrally controlled by a Digital Control System (DCS), which was completed in 1989. The control system upgrade to Foundation Fieldbus (FFB) was completed in the past year.

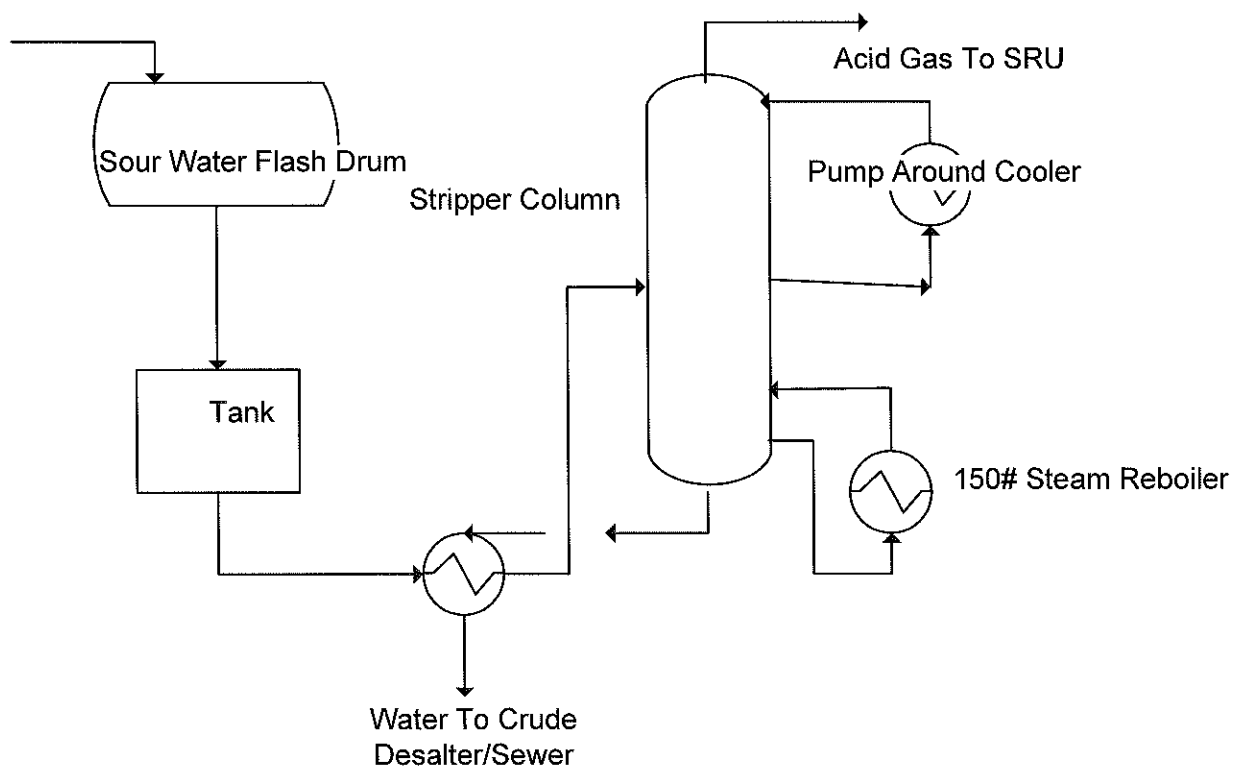
These guidelines have been compiled to comply with paragraph 21C of the New Source Review Consent Decree (NSR CD). The information in this document summarizes the Refinery's guidelines, procedures, etc. for preventing, detecting, and correcting malfunctions or equipment failures which could result in excess emissions. The guidelines, procedures, etc. presented in this document have the general purpose of:

- Establishing good air pollution control practices for minimizing SO<sub>2</sub> emissions.
- Providing for the continuous operation of the Sulfur Recovery Facilities between turnarounds.

### Unit 41 Sour Water Strippers

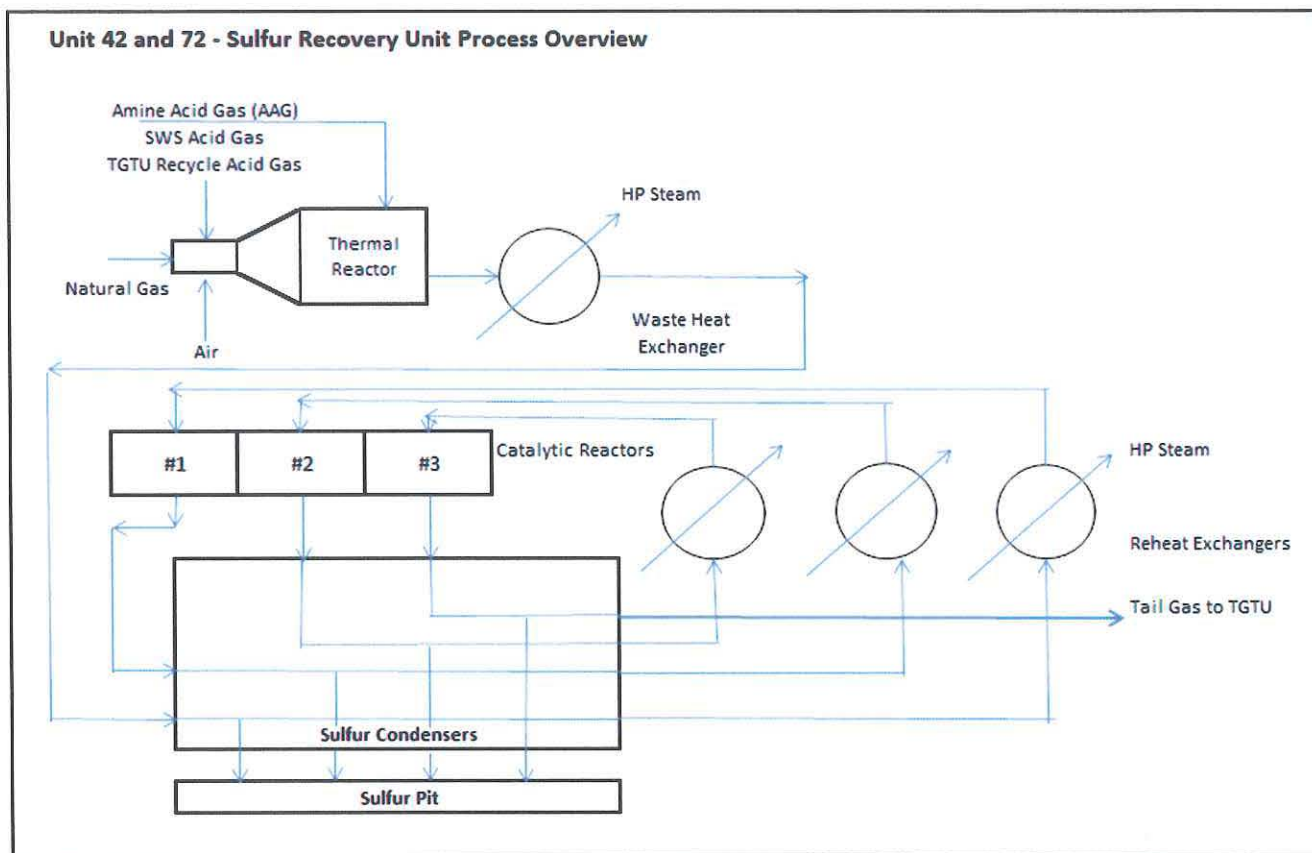


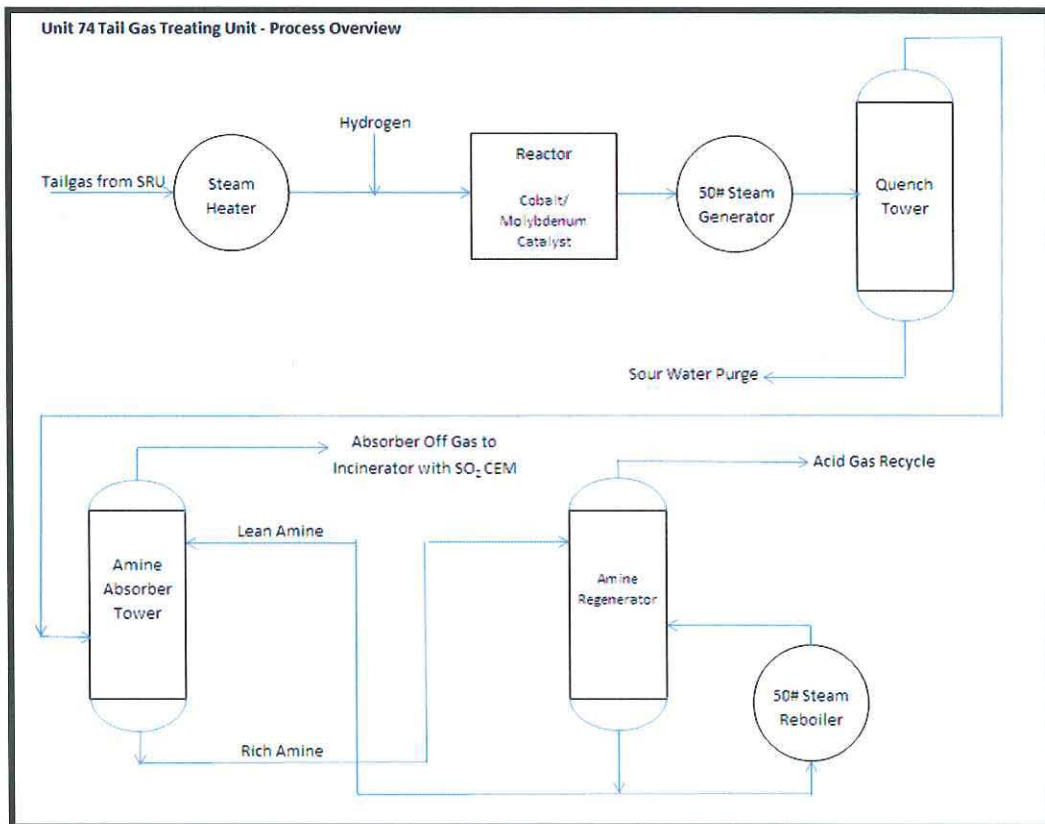
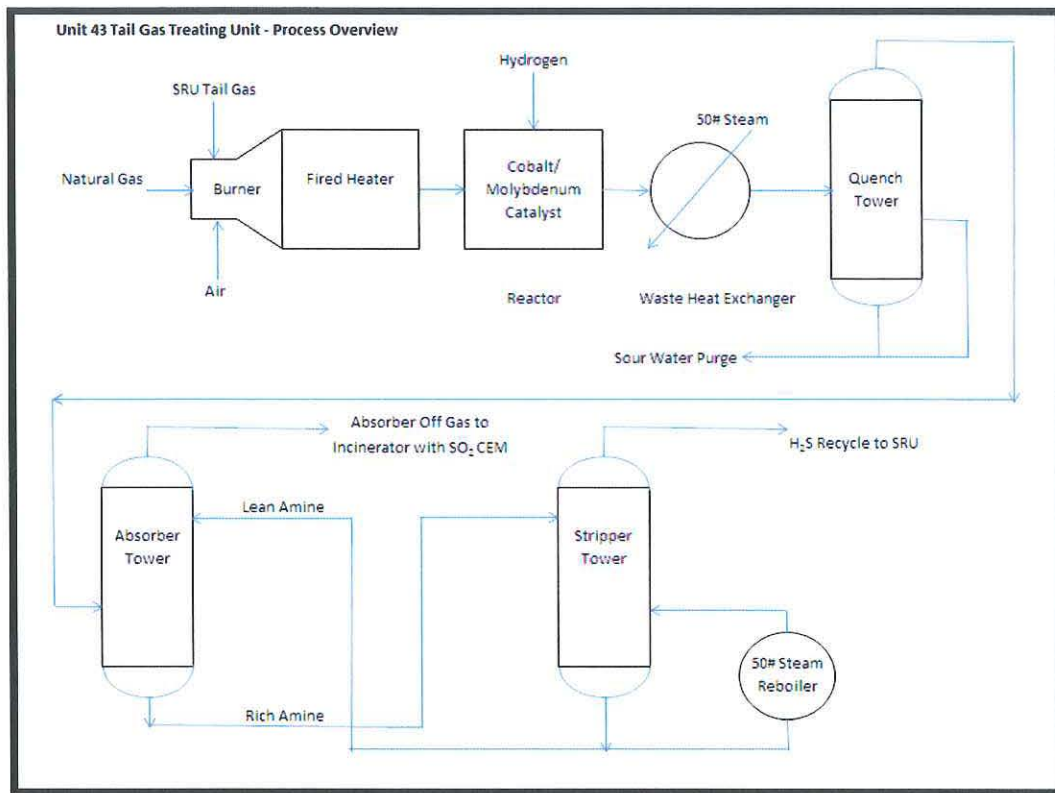
### Unit 73 Sour Water Stripper





## UNITS 42 and 72 Sulfur Recovery Units





**CENTRAL CONTROL BUILDING OPERATIONS & MAINTENANCE MANUAL:** This manual contains information on the utilities and electrical systems used to support the DCS system used to operate the Sulfur Recovery Facilities. The utilities included are the:

- Fire Suppression System
- Water Sprinkler System
- Chilled Water System
- Uninterruptible Power Supply (UPS) System
- Heating System
- Pressurization System
- Air Handling Units

The most critical system, the UPS system, will supply power to the process unit instruments for a period of 20 minutes through a bank of 12 volt batteries should the normal AC source fail. The UPS system is located in each satellite module as well as the Central Control electrical room.

**CRITICAL PROCESS VARIABLES:** A list of the critical process variables which are not to be exceeded for the safe and efficient operation of the Sulfur Recovery Facilities is available. Each variable includes a "not to exceed" (NTE) maximum and/or minimum as well as the consequence of each deviation. These variables are not to be exceeded without the consent of the refinery management and the properly approved Management of Change (MOC) documentation is completed.

**DCS SHUTDOWN SYSTEM TESTING PROCEDURE:** This procedure includes step by step definitions which govern the way the shutdown systems are tested on a routine basis. The shutdown testing is documented and forwarded to the Maintenance Reliability Department upon completion. Any malfunctions are repaired immediately.

**HESS RULES & PROCEDURES:** The refinery maintains Health, Environmental, Safety and Security rules and procedures which are designed to ensure that Operations and Maintenance activities at the refinery are conducted in a safe, environmentally-responsible manner.

**PROCESS AND INSTRUMENT DIAGRAMS:** Operating personnel have access to electronic and paper copies of process drawings as they relate to the Sulfur Recovery Facilities. These drawings are to be "red lined" (updated with a pencil/pen) whenever a change is made to the process piping/instrumentation. The red lined version is retained until revisions to the electronic documents are made by the Engineering Department.

**DOT HAZARDOUS MATERIALS GUIDE:** This guide or digest is an explanation of "How to Use" the Hazardous Materials Regulations of the U.S. Department of Transportation. Shipping and transporting, classifying of hazardous material, how to use the commodity list, labeling and marking packages, storage of hazardous materials, and accident and incident reporting procedures are addressed in this guide.

## SECTION 2

### OPERATOR ROUTINE DUTIES

To ensure the complete sharing of information between shifts, the Sulfur Recovery Facility personnel complete a thorough walk-through of the area at the beginning of their shift and on a routine basis throughout their shift. This is essential to the continued efficient operation of the process area. Without complete documentation, process information cannot be passed on between shifts in a reliable, accurate manner. The following must occur at Operations relief time (i.e., shift change):

- a. The relieving party must arrive at the job site approximately 20 minutes before the start of the scheduled shift.
- b. The relieving party must be fully briefed and ready to assume their job responsibilities before the relieved party can leave the job site.

In addition, Operating personnel are responsible for reviewing the following upon reporting to work on a daily basis:

#### **General Topics**

- PCO/FEO OPSCore “Area Notes” review.
- Operational Guidelines/Foreman's orders review.
- Injury and incident reports.
- Outstanding work permits review / Required gas checks.
- Predictive work in progress (PM).
- Incidental operational maintenance work in progress (OPM).
- Equipment availability.

#### **Area Specific Topics**

- PCO OPSCore “Area Notes” review.
- Operational Guidelines/Foreman's orders review.
- Products Control Daily Orders.
- Review of Laboratory data.
- DCS equipment changes or problems.
- Changes to graphic and faceplate displays.
- Equipment availability.
- Energy isolation review.
- RADAR review.
- Filling Sulfur Railcars.
- Abnormal operations.
- Review operating procedures and arrow diagrams which may be used during the shift.
- Shutdown system status.

## SECTION 3

# LABORATORY TESTING

To help ensure proper operation and adequate H<sub>2</sub>S removal, the following routine analyses are performed on the Complex 2 and Complex 6 amine systems. The frequency of these analyses varies from approximately once per week to daily and can increase if the situation warrants it.

**1. Lean Amine Strength** – To allow for proper H<sub>2</sub>S pick-up in the tail gas, the amine concentration is kept within a range of 40-45 wt.% amines. This amine strength helps ensure that the tail gas absorber is adequately removing H<sub>2</sub>S to minimize SO<sub>2</sub> emissions at the incinerator stack. If the solution strength is too low, fresh amine is added to the system from a bulk tank. Maintaining proper amine strength requires a constant “balancing act” between water entering the amine circulating inventory and water loss caused by purging of the regenerator reflux drum to control NH<sub>3</sub>.

**2. Lean Amine Loading** – Since the target H<sub>2</sub>S in the tail gas stream to the incinerator is very low (<20 ppm) and there is very little pressure to help the amine pick-up the H<sub>2</sub>S, lean loadings are monitored. A typical good TGTU lean loading would be <0.01 mol H<sub>2</sub>S/mol amine (mol/mol is the preferred expression of acid gas in amines). The Refinery target is 0.005 mol/mol. If the lean loadings are too high, the amine will not be able to pick-up the required amount of H<sub>2</sub>S due to the low pressure. If the lean amine loadings are run too low it will waste steam and can cause accelerated corrosion in the piping circuits.

**3. Rich Amine Loadings** – Acid gas (H<sub>2</sub>S & CO<sub>2</sub>) pickup in amine is an equilibrium reaction favored by H<sub>2</sub>S concentration and system pressure or acid gas partial pressure. Increasing either system pressure or acid gas concentration will increase loading. If the amine is loaded too high with H<sub>2</sub>S, it can cause significant corrosion in downstream piping and equipment. A maximum rich loading of 0.5 mol/mol is the upper limit to prevent corrosion. However, in the Tail Gas Absorbers, a maximum equilibrium loading is less than 0.1 mol/mol. Too low of loading on the rich amine signifies wasted energy due to circulating and reboiling more amine than necessary to achieve the correct specification. Rich amine can only be loaded up to a point (especially at low pressures). Increased loadings are favored by higher H<sub>2</sub>S partial pressure in a system. Contactors operating at a high pressure like a Hydrotreater (900 psig) and high H<sub>2</sub>S concentration (5 mol %) will load the amine more than a Tail Gas Absorber that operates at 2 psig and 500 ppmv H<sub>2</sub>S.

**4. Heat Stable Salts** – This is measured on a weekly basis in Complex 2 and Complex 6. If the Heat Stable Salt (HSS) levels become too high, there is an increased risk of corrosion in the piping. HSS tie up amine sites that could be used to pick-up H<sub>2</sub>S. This results in increased circulation rates to achieve the required tail gas specification on H<sub>2</sub>S and also wastes energy. HSS interfere with the lab testing of both rich and lean loadings – usually giving false high results – making it difficult to optimize the unit. HSS build up in the Amine systems over time and purging may be required to maintain <2% HSS.

## SECTION 4

### OPERATIONS PERFORMED MAINTENANCE

Operations performed maintenance (OPM) optimizes equipment reliability and process unit run length. Execution of these procedures is a vital contributor to Sulfur Recovery Facility efficiency. Having operation complete the types of activities outlined in this section allows maintenance personnel to concentrate on more complex repair issues.

- Minor Pipe and Valve Replacement or Repair (2" and Smaller).
- Dismantling Obsolete Piping/Tubing.
- Adjusting Loose Hardware.
- Adjusting Valve Packing.
- Greasing Valves.
- Minor Insulation Removal and Replacement (non-asbestos).
- Steam Tracing Installation and Repair.
- Complex Clean Up.
  - General Equipment Clean Up.
  - Snow Removal.
  - Salt Spreading.
  - General Unit Housekeeping.
- Stenciling Equipment.
- Cleaning Cooling Tower Screens.
- Isolating Equipment per Standard Operating Procedures.
- Remove and Replace Pressure Gauges.
- Remove and Replace Thermometers.
- Minor Painting.
- Blinding Up to 4" Blinds.
- Clean Pump Screens (3" and Under).
- Clean Filter Elements and Baskets.
- Changing Horizontal Heater Burner Tips.
- Cleaning Float Chambers and Sight Glasses.
- Complete Pump Change Out (additive/chemical pumps).
- Testing Equipment for Leaks.
- Winterizing Equipment.
  - Hydrants.
  - Deep Well Pumps.
  - Jacket Water Systems.
  - Floating Roofs.
  - Flare trees.
- Replace Light bulbs, Clean and Replace Protectors.
- Change out Rupture Disks.
- Compliance with Michigan Refining Division Housekeeping Standard #46.

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## SECTION 6

### SO<sub>2</sub> EXCURSION PLAN

The "SO<sub>2</sub> in Incinerator" procedure (ROP-02-41-309-DT provided in Appendix B and ROP-06-74-353-DT provided in Appendix D) provides a step by step analysis for operating personnel to follow in the event of a malfunction of equipment in the Sulfur Recovery Facilities which could result in an excess emission of SO<sub>2</sub> from the SRU incinerator. The actions outlined in this procedure are completed in an expeditious manner in an effort to minimize any potential upset of the Sulfur Plant.

In the event an emergency arises, area personnel would go directly to the Emergency Operating Procedures found in the complex's Information Center. Specific emergency situations are titled on each procedure. The total complex emergency shutdown procedures are listed under one section but are identified as complex wide procedures. Each procedure is written so as to identify the person responsible for the work to be performed (e.g. PCO, Area 1, 2, 3, and 4, 5 and 6 Field Operator). Under each responsible person is the listing of steps to perform in order to safely perform the task. Unless otherwise specified, steps are listed in order of importance.

## SECTION 8

# FORMAL EQUIPMENT INSPECTIONS

### External Inspections

External visual inspections are conducted on pressure vessels, piping, and storage tanks to note visual indications of potential failures, and to make recommendations for corrective action. The frequency of external inspection is in accordance with the applicable American Petroleum Industry (API) code guidelines, City of Detroit Ordinance 705-G, and the National Board Inspection Code. The inspections are prompted through the Inspection Manager Program and the Meridium Corrosion Monitoring Program.

The external inspections are conducted by personnel certified to the appropriate API or NBIC guidelines as required. The inspection reports are written in the Inspection Manager Program and hard copies are filed in refinery equipment files.

### Ultrasonic Thickness Monitoring

Thickness readings are taken on pressure vessels, piping, and storage tanks to identify areas of metal loss and to predict corrosion rates and retirement dates. The frequency of thickness inspection is in accordance with the applicable API and National Board guidelines.

The thickness inspections are conducted by inspection personnel who are qualified to the MPC corporate program for non-destructive examination (NDE) or ASNT. The piping and pressure vessel readings are entered into the Meridium Corrosion Monitoring Program to determine corrosion rates and inspection intervals. The results are retained for the life of the equipment.

### Infrared Monitoring

The SRU reactors are monitored using an infrared camera when appropriate. The infrared survey measures temperatures on vessel/piping exteriors but has limited use on vessels that are refractory lined, externally sheathed or insulated. Shell or piping hot spots indicate areas of potential failed or failing refractory. If deficiencies are identified, corrective actions are implemented.



## **SECTION 10**

### **SULFUR PLANT IMPROVEMENTS**

Since the previous submittal of this PMO Plan (September 2014), the following sulfur plant improvements have been implemented:

1. Anti-Foam Injection for Complex 2 TGTUs.
2. Caustic Injection for Complex 2 TGTU's.
3. New Complex 2 SRU Instrumentation – Trains A and B.
4. Tank 51 Sour Water Storage Hydrocarbon Skim Pumps.
5. Acid Gas and Tail Gas Piping Contro-Trace for Complex 2 SRU A and SRU B.
6. Complex 2 Sulfur Truck and Railcar Loading Ventilation.
7. Steam Trace Complex 2 TGTU #1 Absorber Static Mixer.
8. Eliminate Sulfur Entrainment for Complex 2 SRU A.
9. Replaced Complex 6 SRU A WHE with new design and developed new startup procedure to reduce likelihood of tube leaks.
10. Sulphur Experts North Plant performance evaluation completed.
11. Complex 6 permanent caustic injection piping installed for HSS control.

## SECTION 11

# EMPLOYEE TRAINING

During initial unit training, and every three years afterwards, area personnel are trained on operational aspects of the sulfur recovery units. The Federal Government, Department of Labor, Occupational Safety and Health Administration (OSHA), has dictated under 29 CFR Part 1910.119 that employees involved in operating a process be trained in an overview of that process and in the operating procedures covering that process. The standard requires that *“refresher training be provided at least every three years, and more often if necessary, to each employee involved in operating a process to assure that the employee understands and adheres to the current operating procedures of the process. The employer, in consultation with the employees involved in the operating process, shall determine the appropriate frequency of refresher training.”*

In order to insure that the operating skills developed by each employee are not forgotten and to comply with the Process Safety Management element on *training*, refresher training is conducted in each area on a Complex-wide basis. This may include on-the-job training and evaluation of the procedures that operators successfully complete during routine work.

Training includes the following material:

- Specific Safety and Health Hazards.
- Operating Procedures.
- Emergency Operation.
- System Overview.
- Process Specific Training.
- Safe Work Practices.

An Operations department supervisor documents the training received and understood by each employee while preparing a record which contains the identity of the employee, the date of training, and the method used to verify that the employee understood the material covered.

Each phase of training will contain information on the material tested. To verify that the training is understood and to maintain continuity of training, the following may be utilized:

- A written study guide.
- A written examination.
- An answer key prepared in advance.
- A walkthrough demonstration of the employee skills necessary to perform the tasks as listed on the written walkthrough examination.

## SECTION 13

# INCIDENT REPORTING

Incident investigations are initiated for any malfunction of a refinery process unit. The objective of the investigation is to enhance the safety, environmental compliance, and reliability of the Detroit Refinery by establishing a management system to:

- Capture environmental incidents.
- Investigate incidents.
- Identify root cause(s) and contributing causes.
- Identify and evaluate recommended measures to prevent recurrence and reduce the probability and/or severity of a similar recurrence.
- Ensure timely issuance of incident reports.
- Address and resolve incident recommendations.
- Communicate incidents, their root cause(s) and contributing causes, and recommended preventive measures to ensure timely and effective follow-up action.

Upon completion of the incident investigation, a report of the investigation is developed and relevant findings are presented. Recommendations are developed and assigned to appropriate personnel for completion to minimize the possibility of a recurrence.

This practice applies to all incidents, near misses or unplanned events. Incidents will be classified in one of four categories, each with varying investigation requirements.

Guidelines describing how incident investigations are completed can be found in Procedure RPW-PSM-013-DT *Incident Investigation and Reporting Procedure* of the Michigan Refining Division's HESS Rules and Procedures available in the Information Center.

Effective Date: 7/24/2015  
Next Review Date: 7/24/2020

APOLP  
Dachau Refinery

Doc No: REW-ADM-005-FORM01-DT  
REV NO: 27

**SPILL/RELEASE/EXCESS EMISSIONS REPORT FORM**

**\*\*Initial notification must not be delayed pending collection of information. All fields must be completed.\*\***

**REQUIRED INFORMATION**

Your name: \_\_\_\_\_ Today's date: \_\_\_\_\_  
Refinery contact and phone number: \_\_\_\_\_  
Type of material involved: \_\_\_\_\_  
Start date: \_\_\_\_\_ Start time: \_\_\_\_\_ hrs  
End date: \_\_\_\_\_ End time: \_\_\_\_\_ hrs  
Was the incident on-going at the time of notification? YES NO  
Material/quantity released: \_\_\_\_\_  
Medium/media material released into: \_\_\_Air \_\_\_Water \_\_\_Soil  
Location: \_\_\_\_\_ Size of area impacted: \_\_\_\_\_  
Description of incident/cause (as known at this time): \_\_\_\_\_  
\_\_\_\_\_  
Preventative/corrective measures taken: \_\_\_\_\_  
Assessment of community impacts (known or anticipated acute or chronic health risks associated with this incident): \_\_\_None anticipated at this time \_\_\_ Other: \_\_\_\_\_  
Weather Conditions:  
Wind \_\_\_\_\_ mph Wind Direction \_\_\_\_\_  
Temperature, deg. F \_\_\_\_\_ General weather conditions \_\_\_\_\_  
Did you provide your name & phone number (or alternate) to agency contacts? YES NO  
Did you indicate whether this is an EHS per 40 CFR Part 355 Appendix A? YES NO  
Was the above information provided/available to the agencies notified? YES NO

**AGENCIES NOTIFIED**

1. Wayne County LEPC (734) 728-3711 (313) 967-0014  
Person notified: \_\_\_\_\_ Time: \_\_\_\_\_
2. Detroit LEPC- Home Land Security and Emergency Management 313-596-5562  
Person notified: \_\_\_\_\_ Time: \_\_\_\_\_
3. NRC (800) 424-8802 Report No.: \_\_\_\_\_  
Person notified: \_\_\_\_\_ Time: \_\_\_\_\_
4. City of Detroit Water and Sewerage Department: Systems Control (313) 267-6000; (313) 297-5839  
Email address: blmuyan@dwsd.org  
Person notified: \_\_\_\_\_ Time: \_\_\_\_\_
5. Michigan DEQ Det. AQD (313) 456-4700 PEAS (800) 292-4706  
Person notified: \_\_\_\_\_ Time: \_\_\_\_\_
6. U.S. Coast Guard (313) 568-9560  
Person notified: \_\_\_\_\_ Time: \_\_\_\_\_
7. U.S.EPA (800) 621-8431  
Person notified: \_\_\_\_\_ Time: \_\_\_\_\_
8. Local police/fire department \*P11 Malvindale Fire: (313) 429-1075  
Security Control: (313) 297-6911  
Detroit Fire Department- Fire Command Dispatch Supervisor (FCDs) (313) 596-1660  
Person notified: \_\_\_\_\_ Time: \_\_\_\_\_
9. EPA Region V Local Office (312) 353-2318  
Person notified: \_\_\_\_\_ Time: \_\_\_\_\_
10. MDOT (317) 373-2090  
Person notified: \_\_\_\_\_ Time: \_\_\_\_\_

\*Additional numbers for emergency response can be found in RSW-ERP-010-DT; REW-ERP-005-DT

**ENVIRONMENTAL DEPARTMENT INFORMATION**

Type of notification made (see back): \_\_\_\_\_  
Follow-up time due: \_\_\_\_\_ Time of Construction Knowledge: \_\_\_\_\_

**Notify Environmental Supervisor after any agency notification.**

## SECTION 18

### REVISION HISTORY

Revision number	Description of change	Written by	Approved by	Revision Date	Effective date
0	Original procedure	IWL	DGL	09/15/02	09/15/02
8	Yearly Review	HFS	JFM	09/15/10	09/15/10
9	Yearly Review	HFS	JFM	09/15/11	09/15/11
10	DHOUP additions	JLB	HFS	02/10/12	02/10/12
11	Yearly Review	HFS	JFM	8/24/12	9/7/12
12	Annual Review Format updates and DHOUP incorporation	KFB	IWL	8/28/2013	9/9/2013
13	Annual Review  Updated Product Mix numbers, Sulfur Train Identification for Complex 6, Unit 42/72 Diagram, streamlined Introduction to Section 3 and updated Testing Frequency. Updated Excess Emissions Form, Projects and Headers. Corrected Diagram in Appendix A	KFB	IWL	8/28/2014	9/8/2014
14	Annual Review  Updated Section 10 Sulfur Plant Improvement Projects, Sulfur Shedding SOPs and added links to Document Librarian, Excess Emissions Form, Document Headers	KFB	IWL	8/28/2015	9/8/2016

## **Appendix B**

### **Standard Operating Procedure ROP-02-41-309-DT**

See Document Librarian for current version of this document.

Link:

[Complex 2 - High SO<sub>2</sub> at Incinerator Checklist](#)



## **Appendix D**

### **Standard Operating Procedure ROP-06-72-358-DT**

See Document Librarian for current version of this document.

Link:

[Complex 6 - Acid Gas Reduction Guideline](#)

Sulfur Recovery Facilities - General Maintenance & Operating Guidelines	Doc. No.: REW-AG-051-DT	Rev. No.: 13	Page 39 of 39
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## **Appendix F**

### **Standard Operating Procedure ROP-06-72-350-DT**

See Document Librarian for current version of this document.

Link:

[Plant Wide Sulfur Shedding Guideline](#)